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*Attorney for Helen Tang*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

EDWIN YOSHIHIRO FUJINAGA; and  
MRI INTERNATIONAL, INC.,

Defendants,

and

CSA SERVICE CENTER, LLC;  
THE FACTORING COMPANY;  
JUNE FUJINAGA; and  
THE YUNJU TRUST,

Relief Defendants.

Case No.: 2:13-cv-01658-JCM-CWH

**AMENDED STIPULATION AND  
ORDER TO EXTEND HELEN  
TANG'S DEADLINE TO FILE A  
RESPONSE TO THE RECEIVER'S  
MOTION**

(FIRST REQUEST)

Helen Tang ("Ms. Tang"), by and through her counsel Daniel W. Glasser of the law firm of Chipman Glasser, LLC on the one hand, and Robb Evans & Associates LLC, as receiver (the "Receiver") by and through its counsel, Michael F. Lynch of the Lynch Law Practice, PLLC on the other hand, hereby stipulate to the following:

1. That the Receiver filed its *Motion for Order Authorizing, Directing, and Requiring Rabobank, N.A. and Helen Tang to Immediately Turn Over to the Receiver All Proceeds from the Sale of One Stop Pharmacy*, on December 20, 2017 (ECF No. 464) (the "Motion"). The Receiver filed and served upon Ms. Tang by mail, its Notice of Motion and Opportunity to Object on December 21, 2017. (ECF Nos. 466, 468);

2. That Ms. Tang's response to the Motion was due January 8, 2018. (Fed. R. Civ. P. 6(d) and LR 7-2);

3. That the parties' original Stipulation and Order filed January 8, 2018 (ECF No. 472) mistakenly proposed the court holiday January 15 as the deadline, and thus the parties hereby submit this Amended Stipulation and Order stipulating to a January 16, 2018 deadline;

4. That Ms. Tang requires additional time beyond the original deadline in light of the following: (a) the Receiver's Motion was filed just before the year-end holidays, during which time the undersigned attorneys' and their staffs' regular work schedules were altered and reduced in advance where feasible, (b) Ms. Tang expended reasonable efforts to retain counsel and retained Mr. Glasser on January 5, 2018, and (c) Mr. Glasser has thereby had insufficient time to become fully familiar with the issues raised in the Motion and prepare a substantive response;

5. That it is appropriate under the circumstances to allow Ms. Tang's above-referenced counsel up to and including Tuesday, January 16, 2018 to file a response to the Motion on behalf of Ms. Tang; and

6. That, subject to entry of the order proposed below, the deadline to respond to the Receiver's Motion shall be extended for Ms. Tang only, as follows:

<u>Current Deadline</u>	<u>Proposed Deadline</u>
10/1/2024	9/1/2024
10/15/2024	9/15/2024
11/1/2024	10/1/2024
11/15/2024	10/15/2024
12/1/2024	11/1/2024
12/15/2024	11/15/2024
1/1/2025	12/1/2024
1/15/2025	12/15/2024
2/1/2025	1/1/2025
2/15/2025	1/15/2025
3/1/2025	2/1/2025
3/15/2025	2/15/2025
4/1/2025	3/1/2025
4/15/2025	3/15/2025
5/1/2025	4/1/2025
5/15/2025	4/15/2025
6/1/2025	5/1/2025
6/15/2025	5/15/2025
7/1/2025	6/1/2025
7/15/2025	6/15/2025
8/1/2025	7/1/2025
8/15/2025	7/15/2025
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3/1/2029	2/1/2029
3/15/2029	2/15/2029
4/1/2029	3/1/2029
4/15/2029	3/15/2029
5/1/2029	4/1/2029</

Ms. Tang's deadline to file a response to the Receiver's Motion

01/08/2018

01/16/2018

DATED January 11, 2018.

CHIPMAN GLASSER, LLC

LYNCH LAW PRACTICE, PLLC

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*Attorney for Helen Tang*

*Attorney for the Receiver*  
*Robb Evans & Associates LLC*

IT IS SO ORDERED.

DATED: January 12, 2018

This order  
supersedes the  
parties' stipulation  
at #472, which is  
hereby DENIED as  
MOOT.

C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE